

Your Honor

I would like the court not to grant the relief sought in the attached motion.

I have made a payment of \$1,520.76 on December 12. This is the payment due for October. I will be making another payment of \$1,520.76 by December 31, followed by another payment by February 14. These payments will cover the payments due in this action. I will also follow these payments on March 1 and 15.

I tried to arrange these payments to be taken from my bank account automatically but M&T Bank said these payments could not be automatic debits.

The problems which caused my arrears have been remedied and all future payments will be made when due. Thank you for your consideration in this matter.

Charles Simon

Charles Simon
270 Trenton Road
Fairless Hills, Pa 19030



**LOCAL BANKRUPTCY FORM 9014-3
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Patricia M. Simon
Charles P. Simon

Debtor(s)

CHAPTER 13

M&T Bank

Movant

vs.

NO. 19-17669 AMC

Patricia M. Simon
Charles P. Simon

Debtor(s)

11 U.S.C. Section 362

Scott F. Waterman

Trustee

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

M&T Bank has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **December 29, 2022** you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to movant's attorney:
Bankruptcy Group
KML Law Group, P.C.
Suite 5000 - BNY Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, the United States Bankruptcy Judge, in Courtroom 4 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on **January 4, 2023, at 11:00 A.M.**, or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Denise Carlon, Esq.

Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant

December 14, 2022

